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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

v.

**ANDY AVILES-ORTIZ,
LUIS ALBERTO GONZALEZ RODRIGUEZ,
BRANDY ORTIZ,
CORDERO APOLINAR ALMONTE,**

Defendants.

3:24-mj- 225

**MOTION TO SEAL CRIMINAL
COMPLAINT, AFFIDAVIT IN
SUPPORT OF COMPLAINT, AND
ARREST WARRANTS**

UNDER SEAL

The United States of America, by Natalie K. Wight, United States Attorney for the District of Oregon, and Bryan Chinwuba, Assistant United States Attorney, moves the Court for an order sealing the Complaint and Affidavit in support of the Complaint, the Arrest Warrants, and this motion and subsequent Order, for the reason that disclosure of the information may cause:

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**Motion to Seal Criminal Complaint, Affidavit in Support
of Complaint, and Arrest Warrants**

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destruction of or tampering with evidence, cause intimidation of potential witnesses, cause the defendant's flight from prosecution, and jeopardize any continued investigation through future interviews.

Dated: October 16, 2024

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Bryan Chinwuba
BRYAN CHINWUBA, ILSB #6323733
Assistant United States Attorney